

January 15, 2020

Via Email

Mr. Brian Farrier  
U.S. EPA Region IV  
Superfund Remedial Section C  
61 Forsyth Street, S.W.  
Atlanta, GA 30103-8960  
[farrier.brian@epa.gov](mailto:farrier.brian@epa.gov)

Subject: **Annual Report for 2019** and  
Monthly Progress Report for the Period **December 1, 2019 – December 31, 2019**  
Armstrong World Industries Superfund Site Operable Unit 2, Macon, GA  
Administrative Settlement Agreement and Order on Consent for RI/FS Docket Number:  
CERCLA-04-2018-3759

Dear Mr. Farrier:

This Annual Report and Monthly Progress Report is submitted on behalf of the Respondents<sup>1</sup> in satisfaction of the annual progress reporting requirements under Task 8.2 of the USEPA Region 4 Statement of Work (SOW) for a Remedial Investigation, Feasibility Study and Baseline Risk Assessment, and the monthly progress reporting requirements under paragraph 50 of the USEPA Region 4 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigation/Feasibility Study, U.S. EPA Region 4, Docket No. CERCLA-04-2018-3759: Armstrong World Industries (AWI) Superfund Site, Operable Unit 2 (OU2), Macon, Macon-Bibb County, Georgia.

### **RI/FS Documents and Plans**

In preparation for submittal of Remedial Investigation (RI) / Feasibility Study (FS) plans, respondents and USEPA held a meeting at the USEPA Region IV headquarters on March 12, 2019. EPS presented an overview of the historical data compilation, Chemical of Potential Concern (COPC) screening, Conceptual Site Model (CSM), sampling strategy, and proposed path forward for OU-2. USEPA provided several suggestions for consideration in developing the RI/FS plans. Respondents requested an extension for submittal of the draft RI/FS work plan documents, which was granted by USEPA until April 30, 2019.

Respondents submitted draft RI/FS documents to the EPA on April 29, 2019. This included four separate, but interrelated plans: the RI/FS Work Plan, Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP). The USEPA provided several comments to these plans via electronic mail. On July 1, 2019, the Respondents met with USEPA to discuss the comments and

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<sup>1</sup> Those parties listed in Appendix C of the of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study, U.S. EPA Region 4, Docket No. CERCLA-04-2018-3759.

**Joseph Nicolette**  
Environmental Planning Specialists, Inc. (EPS, Inc.)  
400 Northridge Road  
Suite 400  
Sandy Springs, Georgia 30350  
Direct Phone: 678-336-8554

subsequently submitted (on July 24, 2019) a letter responding to various comments on the plans. USEPA provided additional comments via electronic mail on July 29, 2019 and the Georgia Environmental Protection Division (EPD) provided additional comments on August 5, 2019. Responses to these comments were provided via electronic mail on August 9, 2019. The plans were revised based on the comments received from USEPA and EPD and the final plans were submitted on August 19, 2019. The plans were approved by USEPA in a letter dated September 11, 2019.

A technical memorandum (Technical Memorandum #2: Revised Decision Units and Sample Locations) was submitted on November 27, 2019 requesting a change in some of the sampling locations. Pre-mobilization field work led to a better understanding of the conditions in the lowland areas under dry/low flow conditions, which resulted in a need to revise the Decision Units and sampling locations presented in the Work Plan. The EPA approved of the changes in an e-mail dated December 16, 2019.

### **Public Interaction**

In preparation for a public availability session, EPS met with USEPA Remedial Project Manager and Community Involvement Coordinator (Ron Tolliver) and with ERM representatives (for the adjacent Macon Naval Ordnance Plant site) to plan for the public availability session. EPS prepared posters for the session and attended the session, which was held on November 12, 2019.

EPS personnel met with the USEPA, a former employee of Allied Signal, AWI personnel, and ERM personnel onsite on November 8, 2019 to conduct site walk.

### **Coordination**

EPS personnel met regularly with the USEPA Remedial Project Manager (Brian Farrier) to discuss plans for the site, ongoing activities and scheduling. EPS also interacted regularly with ERM to coordinate activities.

### **Pre-Mobilization Work**

EPS conducted a pre-mobilization field event in November to better define the locations of the ditches, determine access to areas to be sampled, and to do a comparison between different soil and sediment sampling techniques and tools. This effort resulted in submission of the Technical Memorandum mentioned previously to redefine decision units and sampling locations. This effort also resulted in determining the need for specially fabricated equipment for the soil sampling, which was then ordered.

Access agreements were put into place with the majority of property owners on whose land the sampling would take place (primarily AWI and Macon Water Authority). Respondents are still in the process of trying to obtain access agreements with two other third parties.

### **Activities Conducted December 1, 2019 through December 31, 2019**

- Set-up field office.
- Ordered specialized sampling equipment and sample bottles.
- Spent a week conducting fish sampling the first week of December. However, as the fish collection rate was poor this task was suspended until warmer weather in the hopes of better results. See the Problems Encountered section for more information.
- The groundwater sampling was conducted in mid-December.
- Depth to groundwater measurements were coordinated with ERM.

### **Activities Planned for January and February 2020**

- Conduct soil, sediment and surface water sampling in OU2.
- Conduct sediment and surface water sampling in Rocky Creek.

### **Problems Encountered**

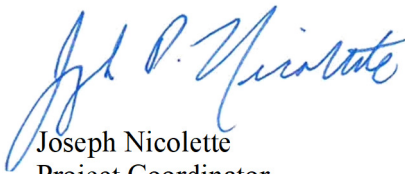
- Obtaining all necessary access agreements: taking additional time to secure.
- During the fish sampling event, the catch rate was very low with most of the catch being too small to be used. We used multiple fishing techniques in different areas of Rocky Creek, but did not see significant improvement in catch rates. Thus, we suspended the fish collection effort. We believe the low catch rate was due to two primary factors 1) the low temperatures reduced fish activity and made it harder to catch as they were likely in inaccessible areas, and 2) we had initially planned to use gill nets for collection, but the DNR would not grant us permission in our fishing permit to use gill nets. Accordingly, the combination of less effective fishing methods and low temperatures resulted in halting the fish collection. We will likely postpone the fish collection until early spring when there is a rise in temperature.

### **Validated Results of Sampling and All Other Data Obtained through Field Work**

- None

Should you have any questions or comments regarding this progress report or any other aspect of this project, please do not hesitate to contact me.

Sincerely,



Joseph Nicolette  
Project Coordinator  
EPS, Inc.

cc:

Sharon Priyadarshini: GA Dept of Natural Resources (via email to Sharon.Priyadarshini1@dnr.ga.gov)  
Timmerly Bullman (via email to tbullman@montrose-env.com)  
Kirk Kessler (via email to kessler@montrose-env.com)  
John Ackiewicz (via email to jaackiewicz@armstrongceilings.com)  
Joe Davis (via email to jadavis@armstrongceilings.com)  
Bill Hahn (via email to wthahn@armstrongceilings.com)  
Melinda Morrison, Esq. (via email to mlrmorrison@armstrongceilings.com)  
Bonnie A. Barnett, Esq. (via email to bonnie.barnett@dbr.com)

Nicole Josko, Esq. (via email to [nicole.josko@dbr.com](mailto:nicole.josko@dbr.com))  
Rebecca Davis, Esq. (via email to [rdavis@seyfarth.com](mailto:rdavis@seyfarth.com))  
Virgil L. Adams, Esq. (via email to [vadams@adamsjordan.com](mailto:vadams@adamsjordan.com))  
Prashant Gupta (via email to [prashant.gupta@honeywell.com](mailto:prashant.gupta@honeywell.com))  
Dawn Lamparello, Esq. (via email to [dawn.lamparello@klgates.com](mailto:dawn.lamparello@klgates.com))  
Brett Marston, Esq. (via email to [brett.marston@arnoldporter.com](mailto:brett.marston@arnoldporter.com))  
Bart Seitz, Esq. (via email to [bart.seitz@bakerbotts.com](mailto:bart.seitz@bakerbotts.com))  
Kirk Gribben (via email to [kirk.gribben@arconic.com](mailto:kirk.gribben@arconic.com))  
Robert Prezbindowski (via email to [robert.prezbindowski@arconic.com](mailto:robert.prezbindowski@arconic.com))  
Max Wilson (via email to [john.m.wilson@usace.army.mil](mailto:john.m.wilson@usace.army.mil))  
E.J. Colbert (via email to [eldries.j.colbert@usace.army.mil](mailto:eldries.j.colbert@usace.army.mil))  
Mark Wyzalek (via email to [mwyzalek@maconwater.org](mailto:mwyzalek@maconwater.org))  
Cathy Nolan (via email to [cathy.nolan@klgates.com](mailto:cathy.nolan@klgates.com))